

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

KIDANEMARIAM KASSA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL RIGHTS COMPLAINT
	)	42 U.S.C. §1983
	)	
	)	CIVIL ACTION NO.
	)	1:17-CV-02068-AT
FULTON COUNTY, GEORGIA,	)	
PAUL H. HOWARD, officially &	)	
Individually,	)	
ANTIONETTE STEPHENSON,	)	
individually, PIERRE EASLEY,	)	
individually, and JOHN DOE,	)	
officially & individually,	)	
	)	
Defendants.	)	
	)	

**DEFENDANT PIERRE EASLEY'S AMENDED SPECIAL APPEARANCE MOTION TO  
DISMISS PURSUANT TO FED.R.CIV.P. 12(b)(2), 12(b)(5) AND 12(b)(6)**<sup>1</sup>

COMES NOW Defendant Pierre Easley ("Defendant"), by and through undersigned counsel and in his individual capacity, and moves this Honorable Court to dismiss the claims asserted against him in Plaintiff's Civil Rights Complaint due to insufficiency of service of process, the Court's lack of personal jurisdiction, and Plaintiff's failure to state a claim upon which relief can be granted. Defendant moves this Court to

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<sup>1</sup> Defendant files this amended motion to dismiss by special appearance only, without waiving the defenses of insufficiency of process, subject matter jurisdiction and venue or submitting himself to the jurisdiction of this Court.

grant the instant Amended Special Appearance Motion to Dismiss for the reasons more fully shown in the Brief in Support of Defendant's Amended Special Appearance Motion to Dismiss. The legal authority supporting this motion is filed contemporaneously herewith.

Respectfully submitted, this 28<sup>th</sup> day of September, 2017.

**OFFICE OF THE COUNTY ATTORNEY**

Patrise Perkins-Hooker  
COUNTY ATTORNEY  
Georgia Bar No. 572358

Kaye W. Burwell  
Deputy County Attorney  
Georgia Bar No. 775060

/s/ Ashley J. Palmer  
Ashley J. Palmer  
Senior Assistant County Attorney  
Georgia State Bar No. 603514

**OFFICE OF THE FULTON COUNTY ATTORNEY**

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	)	
Defendants.	)	
_____	)	

**CERTIFICATE OF SERVICE**

THIS CERTIFIES that on September 28, 2017, I presented this document in Courier New, 12 point type, and that I have electronically filed the foregoing **DEFENDANT PIERRE EASLEY'S AMENDED SPECIAL APPEARANCE MOTION TO DISMISS PURSUANT TO FED.R.CIV.P. 12(b)(2), 12(b)(5) AND 12(b)(6)** with the Clerk of Court using the CM/ECF system, and will provide mail notification to the following attorney of record:

Tiffany Williams Roberts  
Tiffany W. Roberts, Attorney at Law  
Suite 400  
235 Peachtree Street  
Atlanta, Georgia 30303

This 28<sup>th</sup> day of September, 2017.

/s/ Ashley J. Palmer  
Ashley J. Palmer  
Senior Assistant County Attorney  
Georgia State Bar No.: 603514

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